



Epstein Drangel LLP

60 East 42nd Street, Suite 2520, New York, NY 10165

T: 212.292.5390 • E: mail@ipcounselors.com

www.ipcounselors.com

February 17, 2021

VIA ECF

Hon. Paul G. Gardephe
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

**Re: *Maverick Real Estate Partners LLC v. Maverick Commercial Properties Corp. and
Maverick Capital Partners LLC***
Civil Case No. 21-cv-755
Letter Motion to Extend Time to Respond to Complaint

Dear Judge Gardephe,

We represent Plaintiff Maverick Real Estate Partners LLC (“Plaintiff”) in the above-referenced action (the “Action”).¹ We write, with the consent of counsel for Defendants Maverick Commercial Properties Corp. and Maverick Capital Partners LLC (collectively, “Defendants”), to request an extension of time for Defendants to respond to the Complaint from February 22, 2021 to March 8, 2021 to enable the parties to continue settlement discussions. This is the first request for an extension of time to respond to the Complaint.

Based upon the forgoing, it is respectfully requested that the Defendants’ time to answer, move or otherwise respond to the Complaint be extended to March 8, 2021. We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: _____

Ashly E. Sands (AS 7715)
asands@ipcounselors.com
60 East 42nd Street, Suite 2520
New York, NY 10165

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Complaint or Application.

Hon. Paul G. Gardephe
February 17, 2021
Page 2

Telephone: (212) 292-5390
Facsimile: (212) 292-5391
Attorneys for Plaintiff
Maverick Real Estate Partners LLC